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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
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KANSAS CITY, KANSAS 66115

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PRMT SECTION

MEMORANDUM

SUBJECT: Review of revised RFA Sampling Plan for Hydrocarbon Recyclers, Inc., Wichita, Kansas

FROM: Robert B. Dona *RBD Dona*  
Environmental Engineer, QADE/EDSB/ENSV

TO: Mark Matthews  
Work Assignment Manager, PRMT/RCRA/WSTM

THRU: Jeffrey A. Wandtke *JAW*  
Regional QA Officer, QADE/EDSB/ENSV

The Sampling Plan for the RCRA Facility Assessment at Hydrocarbon Recyclers, Inc., Wichita, Kansas dated January 6, 1992, that we received from you on January 7 has been reviewed for adequacy and completeness in accordance with Regional SOP No. 1330.2A. I recommend that the sampling plan be approved with the following comments.

1. This first revision of the draft sampling plan contains significant changes to the sampling objectives and design with the deletion of soil sampling from several SWMU's and AOC's, the addition of soil and soil gas sampling to other areas and the addition of a groundwater monitoring network.
2. Comments 1. and 4. on the draft sampling plan have been satisfactorily addressed by the substitution of ideno (1,2,3-cd) pyrene for ideno (cd) perylene in Tables 2 and 4 and the deletion of the soil field blank in Table 5.
3. Comment 2. has not been entirely resolved. The SW-846 method number for mercury are correct on the Analytical Services Request Form but are incorrect in the second line of page 10.
4. The method detection limits in Table 4 are still inconsistent with SW-846, Table 2-19 for groundwater which correspond closely with the method detection limits of the Region VII Laboratory. The units for water samples should be ug/l for all target compounds. The units for inorganic elements in soil should be mg/kg while the units for organic compounds in soil should be ug/kg.



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5. In the paragraph on groundwater sampling on page 13, it says that the replicate sample will be collected from the well exhibiting the greatest contamination. It is not clear whether the term "greatest contamination" refers to the pH, conductivity and temperature readings or to the FAS VOC analysis. In the future the criteria for contamination should be more precise.

If you have any questions, please call me at 551-5182.

Attachment

Activity No. QQA56